

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of:	)	
	)	
	)	
Amendment of Part 90 of the Commission's	)	WP Docket No. 07-100
Rules	)	
	)	

**COMMENTS OF MOTOROLA, INC.**

Motorola Inc. ("Motorola") hereby files the following comments in response to the Federal Communications Commission's Second Further Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding.<sup>1</sup> Motorola would like to take this opportunity to comment specifically on the Commission's proposed changes to the station identification rules of Section 90.425.<sup>2</sup> Motorola generally supports the Commission's proposed updates to the station identification rules, however, we recommend some modifications and clarifications in order to promote efficiency and regulatory parity while still serving the important purposes of the station identification rules.

Appropriately, the Commission's proposed Section 90.425(g) allows VHF and UHF PMRS licensees the same flexibility as 800 MHz and 900 MHz Part 90 operations to transmit the required station identification using digital signals instead of Morse code. However, as written this flexibility is only extended to exclusive licensees in the 150-170 MHz and 450-470 MHz bands. The Commission should expand this ability to any exclusive licensee in the bands between 150 MHz and 512 MHz. This modification would allow similarly situated licenses

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<sup>1</sup> See *Amendment of Part 90 of the Commission's Rules*, Second Report and order and Second Further Notice of Proposed Rulemaking, 25 FCC Rcd 2479 (2010) ("NPRM").

<sup>2</sup> See *id.*, ¶ 45, Appendix D, ¶ 6.

operating in other bands, particularly the 470-512 MHz and 421-430 MHz bands, to benefit from this same regulatory relief.

The Commission also proposes to permit all stations subject to a station identification requirement to use a single call sign for commonly owned facilities that are operated as part of a single system.<sup>3</sup> This will remedy a situation in which a disparate regulatory approach allowed some CMRS licensees to benefit from more flexibility than similarly situated PMRS licensees with respect to station identification. However, as written, the Commission's proposed paragraph (f) to Section 90.425 also changes the time period in which stations must transmit identification information. The new paragraph would require that for all stations "the call sign must be transmitted each hour within five minutes of the hour, or upon completion of the first transmission after the hour."<sup>4</sup> Although this conforms to the existing rule for CMRS systems in Section 90.425(e)(2), the proposed rule conflicts with Section 90.425(a), which requires that PMRS station identification be transmitted "during each transmission or exchange of transmissions, or once each 15 minutes (30 minutes in the Public Safety Pool) during period of continuous operation."<sup>5</sup>

Existing equipment is programmed to comply with the current provisions of Section 90.425(a). Any rule changes adopted here should not require existing transmitters to be modified to comply with new timing restrictions. If the Commission chooses to adopt a uniform rule that the station identification should be transmitted at the top of each hour, it should exempt existing Public Safety and Industrial/Business pool trunked systems, and those systems currently in production and development based on the existing rule.

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<sup>3</sup> See NPRM at Appendix D, ¶ 6.

<sup>4</sup> *Id.*

<sup>5</sup> See 47 C.F.R. § 90.425(a).

Finally, with respect to station identification, Motorola proposes that the Commission only require station identification information to be transmitted on the lowest trunked frequency in an exclusively licensed UHF or VHF trunk group. This is the current policy with respect to 800 MHz and 900 MHz trunked systems, and adoption of a similar rule for UHF and VHF PMRS trunked systems would promote efficiency and would serve the Commission's goal of technology neutrality by bringing the regulatory framework for the various bands into parity. This proposal would only apply to licensees with exclusive use of the trunked frequencies.

In conclusion, Motorola supports the Commission's proposed approach to modifying the station identification rules. With the minor modifications detailed above, the proposed rules will effectively address technological developments in trunked PMRS systems and will place these systems on an equal regulatory footing with other similarly situated services.

Respectfully submitted,

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